

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SECOND AMENDMENT FOUNDATION,	§	
<i>et al.,</i>	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	CIVIL ACTION NO. 3:21-CV-0116-B
	§	
BUREAU OF ALCOHOL, TOBACCO,	§	
FIREARMS AND EXPLOSIVES, <i>et al.,</i>	§	
	§	
Defendants.	§	

DECLARATION OF JOHN FRAZER

My name is John Frazer. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following declaration is true and correct:

1. I am over twenty-one years old and am fully competent to make this declaration.

Unless otherwise noted, I have personal knowledge of all matters stated herein.

2. I am the Secretary and General Counsel of the National Rifle Association of America (the “NRA” or the “Association”). I have served in these positions since 2015. Through these positions, I am personally familiar with matters described in this declaration.

3. I understand that in opposition to the NRA’s motion to intervene, the government states that the “NRA does not explain whether its members determine group leadership, whether and to what extent members finance the organization, and its members participate directly in making and implementing day-to-day decisions” of the organization. I would like to answer these questions.

4. Each member of the NRA's 76-person, independent Board of Directors is elected directly by the NRA's members via a balloting process. The results of such a process are verified by an independent accounting firm, and the results are announced annually at the NRA Annual Meeting of Members.

5. Specifically, Article IV, Section 1, of the NRA Bylaws states:

"The Board of Directors shall consist of seventy-six (76) Directors as follows: (1) Seventy-five (75) Directors, elected for three (3) year terms as provided in Article VIII from lifetime members of the Association who are entitled to vote and have been lifetime members for a minimum of 5 years at the time of nomination."

6. Individual members who are not lifetime members or annual members also have an opportunity to participate in board elections. Those with five (5) or more consecutive years of membership and who are otherwise qualified to vote pursuant Section 6(e)(1) of the NRA Bylaws may vote for the seventy sixth (76th) Director on the occasion of the Annual Meeting of Members.

7. The NRA Board of Directors annually elect several of the NRA's officers, including the President, two vice-presidents, Executive Vice President (i.e., the chief executive officer), Secretary and Treasurer. The results of such elections are recorded in the meeting minutes and published for the benefit of NRA members.

8. In sum, the NRA's members determine group leadership for the NRA.

9. NRA members are the primary source of financing for the NRA. The NRA (or its affiliates) solicit membership dues, donations, and political contributions from its approximately 4.2 million members.

10. The NRA has members in all 50 states. Given the size, scope and geographic diversity of the organization's membership, it is of course impossible for all 4.2 million members to "participate directly in making and implementing day-to-day decisions" of the organization. No large membership organization functions like that.

11. That said, I can personally attest to the fact that, as an elected body of the membership, the NRA Board of Directors directs its firearms training, community programming, and Second Amendment advocacy with the interests of its members in mind, and is strongly influenced by their input.

12. The NRA's large Board of Directors boasts members from all over the country. Many Board members are former elected representatives and are closely involved in the affairs of their communities. Many are attorneys or grassroots activists who have advocated directly for the rights of gunowners. Many are former members of the military or law enforcement. They are in constant touch with our members and make sure that the NRA's day-to-day operations are aligned with our mission of protecting law-abiding gun-owners and their communities. In sum, the NRA is a "membership organization" to its core.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of June 2023.

/s/ John Frazer

John Frazer
Secretary and General Counsel,
National Rifle Association